

January 11, 2022

Submitted via ECF

Magistrate Judge Alex G. Tse
San Francisco Courthouse
Courtroom A - 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Plaintiffs' Supplemental Letter re: Joint Letter Brief re: Google's Motion to
Expedite Plaintiffs' Depositions (Dkt. 199)
Rodriguez v. Google LLC, Case No. 3:20-cv-04688-RS (N.D. Cal.)

Dear Magistrate Judge Tse:

I write on behalf of the Plaintiffs to inform the Court that we have received Google's January 10 production, which includes roughly 6 gigabytes of data. Our initial review of the data confirms there are certain deficiencies in this production that may need to be addressed by the Court. If the Court is inclined to consider Google's January 10 production in its decision on Google's motion to expedite the named Plaintiffs' depositions (Dkt. 199), Plaintiffs respectfully request leave to submit a supplemental three-page joint letter concerning the production's deficiencies.

Even setting aside the deficiencies in the January 10 production, Google's motion to expedite should be denied for the reasons set forth in Plaintiffs' portion of the joint letter brief. In addition, Plaintiffs wish to inform the Court that certain core members of the Plaintiffs' legal team recently tested positive for COVID-19, making the deposition schedule proposed by Google even more unduly burdensome.

Respectfully,

/s/ Amanda Bonn

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